



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

Brian Zapert
Assistant Corporation Counsel
phone: (212) 356-2354
bzapert@law.nyc.gov

November 9, 2020

VIA ECF

Honorable Steven M. Gold
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Tyshawn Baldwin, et al. v. City of New York, et al.
18 CV 7366 (NG) (SMG)

Your Honor:

I am an Assistant Counsel in the Office of James E. Johnson Corporation Counsel of the City of New York and the attorney assigned to represent the defendants in the above-referenced matter. I write to you on behalf of both parties to request a thirty day extension of the current discovery schedule.

The parties have been attempting to schedule remote depositions. The increased NYPD staffing levels necessitated by last week's elections caused logistical difficulties in scheduling the named Officers in this case for depositions over the past few weeks.

For the foregoing reason, both parties respectfully request that the Court enlarge the current discovery schedule by thirty days from November 16, 2020 to December 16, 2020. Both parties thank the Court for its consideration herein.

Respectfully submitted,

Brian Zapert/S/

Brian Zapert
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Robert Marinelli, Esq. (by ECF)
Attorney for Plaintiffs
305 Broadway, Suite #1001
New York, New York 10007